

Compliance Assessment Report CAR_NRW0041211

Permit being assessed: PP3739BK.

For: Unit 11, held by Shield Environmental Services Limited

At: Unit 11, Martin Road, Tremorfa Industrial Estate, Tremorfa, Cardiff, Cardiff, CF24 5SD.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 31/12/2022.

Parts of permit assessed: Annual Returns

NRW Lead Officer: Lewis Evans.

Report sent to: Mark Davies, Stores Manager on 16/02/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E5 - Emissions - Waste	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Shield Environmental Services Ltd

Permit Number: PP3739BK

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter NRW) assessment against Shield Environmental Limited's (hereafter Shield) Waste returns for 2022 and Shield's yearly report in line with permit condition 4.2.1.

The waste returns and yearly report were both submitted on the 1st February 2023.

All returns have been accepted and are compliant with the environmental permit.

As to the previous years, there has been little change on site in 2022. Skips are kept securely locked apart from when in use with CCTV monitoring the area the skips are in. Atlantic Recycling are used as a haulage company for Shield.

No contamination has occurred on site in 2022. No decontamination has been required either.

The following relates to the Waste Treatment BREF.

Shield Environmental Waste Treatment Bref Improvement Conditions

Shield Environmental Services Limited (SE) permit was varied following the Best Available Techniques (BAT) Reference Documents (BREF) for Waste Treatment which was published on the 17 August 2018 in the Official Journal of the European Union. This variation incorporates the changes required by the Industrial Emissions Directive following a statutory review of permits in the Waste Treatment sector. These include the amendment of the wording of several permit conditions relating to notifications, changes to emissions limits and monitoring requirements. Based on the information provided in the Regulation 61(1) response, Natural Resources Wales (NRW) set out an improvement condition (IC3) containing several BAT Conclusions for Shield Environmental to complete.

These conditions and their responses are set out below.

BAT 1

(i – x, xii, xiii) In order to improve the overall environmental performance, BAT is to implement and adhere to an environment management system (EMS) that incorporates all of the features listed in BAT 1.

Shield Environmental Response:

To satisfy this BAT conclusion Shield Environmental provided the applicable documents to each point outlined in the BAT (i–x, xii, xiii).

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 2

In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques described in BAT 2.

Shield Environmental Response:

Shield have contracts with clients and only the wastes specified are received on site.

Accompanying paperwork is checked on arrival. Only permitted waste will be accepted onto site. Shields Waste Transfer Procedure Manual Cardiff 3.3.1 will apply during normal opening times. Details of every waste delivery are recorded. The waste is stored in secure containers. Only single stream wastes are collected and stored together. All non-Asbestos waste is removed.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 4

In order to reduce the environmental risk associated with the storage of waste BAT is to use all the techniques given in BAT 4.

Shield Environmental Response:

Although intended for new plants, the site has impermeable surface, there are no water courses present. Accepted waste deliveries are via vehicles which are directed to the designated unloading area. This reduces unnecessary waste movements and handling. Storage capacity is 50 tonnes Maximum storage time is 4 months. The daily deliveries and removals are recorded to ensure compliance with the requirements. The material is double bagged. The storage containers are secured and labelled. Materials are not sensitive to heat, light, air, water etc. Containers are checked on a daily basis. The area for used for storing and handling bagged asbestos is clearly identifiable.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 5

In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures

Shield Environmental Response:

As per the:

- Waste Transfer Procedure Manual Cardiff
- Integrated Management System Manual
- Waste Transfer Procedure Manual Cardiff – All waste movements are recorded to control the quality of waste inputs/outputs and for financial processing/invoicing purposes.
- Integrated Management System Standard Procedure EMERGENCY PROCEDURES document ASP021-V8-210414
- Emergency Procedures V3 - 210820

The site is a transfer station. Wastes are delivered in sealed bags/containers and transferred to skips for storage until removal from site. No mixing or blending of wastes occurs on site. Waste movements on site are escorted and controlled by site personnel at all times.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 14

In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques described in BAT 14.

Shield Environmental Response:

Shield Environmental have provided information to show that they have a fibre air monitoring which takes place every quarter to show that fibre levels within the waste room remains below the control limit of <0.1 f/ml. Waste received is double bagged and transferred into secured containers on site. Due to the operations undertaken at the site and the materials involved Corrosion is not seen as an issue. General maintenance and site upkeep is an on-going process. Daily inspections are in place to report any defects/preventative works required. Waste Transfer Procedure Manual Cardiff document 3.8 Site inspection Monthly and daily checks will be carried out by the Transfer Station staff. Defaults are to be communicated to the Site Manager on a daily basis. Planned maintenance will be scheduled to ensure that all fixed and mobile plant, electrical and mechanical equipment, fire alarm and dust suppression devices are in safe working order. Material is double bagged and stored in secured containers. Any other work is carried out inside a building. The work area is kept under a negative pressure to ensure no fugitive emissions occur. If fugitive emissions are experienced the steps set out in the Integrated Management System Standard Procedure emergency procedures document will be followed. Integrated Management System Standard Procedure emergency procedures. 5.2 Detail 1. All waste within regulation asbestos identified waste bags will be sufficiently wetted at all times before removal. A suitable wetting agent or PVA solution will be applied to all materials upon removal, therefore, if any waste bags are breached outside an enclosure or working area the risk to other workers or members of the public will be minimal, due to the materials within the bag being saturated or coated in the relevant solution. Site inspections occur twice a day. Any litter will be dealt with immediately. Due to the nature of the waste material work areas are kept clean/clear at all times. Any waste spillage would be dealt with as an incident and the emergency procedures as set out in Integrated Management System Standard Procedure emergency procedures would be followed.

The site primarily deals with asbestos which is a silicate mineral material. Leak detection is checked using a smoke machine to check the integrity of the sealed internal work area, which is kept under vacuum conditions.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 18

In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given in BAT 18.

Shield Environmental Response:

As per the Integrated Management System Manual

7.2 Competence We have determined the competence of people doing work under our control that affects performance to ensure that these people are competent on the basis of appropriate education, training or experience and where applicable, take actions to acquire the necessary competence and evaluate the effectiveness of the actions taken. The asbestos division undertake training needs analysis on their operatives and supervisors to identify any areas of improvement.

See document:

- QM012 Training and certification
- AR029 Operative competency assessment form
- AR070 Supervisor competency assessment form

Equipment guarding is inspected and maintained to contain noise. The processing/sorting of material takes place inside of the building. No vibrations are experienced on the site. The

site has never received a complaint referencing noise. NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 19

In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques described in BAT 19.

Shield Environmental Response:

Site water usage is recorded and reported to NRW annually using form water usage 1, wastewater is also reported. The company monitors the water usage as part of its KPI's.

Surface water Rainwater on the concrete pad is directed into a tank that can be isolated from normal storm drains. Any waste sorting occurs in the covered building.

All secured waste containers are outside on the impermeable concrete pad.

Water usage is monitored as part of the site efficiency, noted trends are investigated to ensure equipment. Water usage is reduced by pro-active maintenance. Mist spray nozzles have replaced traditional nozzles to reduce the amount of water required and aid water conservation.

Site water is not treated, wherever possible water is re-used.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 21

In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques described in BAT 21.

Shield Environmental Response:

Waste Transfer Procedure Manual Cardiff

2.3 Site security

The premises are fenced, gated, alarmed and surveyed by Closed Circuit Television. The main gate is locked outside normal operational hours.

2.4 Container security

Containers will be padlocked shut at all times, other than during receipt and despatch of waste.

3.10 Fire and resultant risks It is highly unlikely that a fire will affect the transfer station, as asbestos is a fire retardant material. However, there is always a chance of a fire in the vicinity.

There is a sealed drain in the secure area, so there is no significant risk of contamination of surface water systems by fire fighting foam, if there was a fire in the vicinity.

Integrated Management System Standard Procedure:

- EMERGENCY PROCEDURES ASP021-V8-210414

Section 7.3 Awareness

We have ensured that people doing work under our control are aware of our policies; our Quality, Environmental and Health & Safety Objectives are relevant to them; their contribution to the effectiveness of the system. The person/s carrying out the works are made aware of the implications of not conforming to the IMS requirements: which may lead to the issue of a non-conformance against the person/s responsible with possible exclusion on

future works. We ensure that staff are aware of hazards, risks and actions determined that are relevant to them and the arrangements providing staff the ability to remove themselves from work situations that they believe present an imminent and serious danger to their life or health as well as protecting them from undue consequences for doing so.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

BAT 23

In order to use energy efficiently, BAT is to use both of the techniques given in BAT 23.

Shield Environmental Response:

a. Energy efficiency plan

An energy efficiency plan entails defining and calculating the specific energy consumption of the activity (or activities), setting key performance indicators on an annual basis (for example, specific energy consumption expressed in kWh/tonne of waste processed) and planning periodic improvement targets and related actions. The plan is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.

Energy usage is being monitored, energy efficiency lighting is replacing existing traditional lighting, lighting on timers. The organisations replacement policy to ensure the most efficient equipment is sourced when replacing old or broken equipment, this is economical common sense.

b. Energy balance record

An energy balance record provides a breakdown of the energy consumption and generation (including exportation) by the type of source (i.e. electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). This includes: (i) information on energy consumption in terms of delivered energy; (ii) information on energy exported from the installation; (iii) energy flow information (e.g. Sankey diagrams or energy balances) showing how the energy is used throughout the process. The energy balance record is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.

Energy consumption data is recorded as shown in the record Shield Energy Usage, detailing energy usage against tonnes processed.

NRW are satisfied that the requirement of the BAT conclusion has been met and consider this BAT conclusion complete.

END

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.